

EXHIBIT A

In re: NEURONTIN MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION))))))	MDL Docket No. 1629 Master File No. 04-10981 Judge Patti B. Saris
THIS DOCUMENT RELATES TO:))))))	PLAINTIFF'S RULE 26(a)(1) DISCLOSURES
SMITH vs. PFIZER, INC. et al. 05-CV-11515-PBS))))))	

PLEASE TAKE NOTICE, that pursuant to FRCP Rule 26(a)(1):

1. Police, fire and ambulance personnel who responded to/investigated the incident;
2. Physician(s) prescribing Neurontin:
 - Paul R. McCombs, M.D., Neurosurgical Associates, 4230 Harding Rd, Suite 303, Nashville, TN 37205;
 - Edward S. Mackey, M.D., Tennessee Orthopaedic Alliance, 4230 Harding Rd, Suite 1000, Nashville, TN 37205;
3. Frank M. Berklacich, M.D., 4230 Harding Rd, Suite 805, Nashville, TN 37205;
4. James R. Cato, M.D., Heritage Medical Associates, 2325 Crestmoor Drive, Nashville, TN 37215;
5. David N. Dyer, M.D., Baptist Medical Plaza I, 2011 Church Street, Suite 505, Nashville, TN 37203;
6. Carl R. Hampf, M.D., Neurological Surgeons, P.C., 2410 Patterson Street, Suite 500, Nashville, TN 37203;
7. Tom E. Nesbitt, Sr., M.D., Spaulding / Nesbitt Urology Clinic, P.C., 2110 Church Street, Nashville, TN 37203;
8. Eugene M. Regen, Jr., M.D., Tennessee Orthopaedic Associates, P.A., 301 21st Avenue, North, Nashville, TN 37203;
9. William A. Shell, M.D., Tennessee Orthopaedic Alliance, 4230 Harding Rd, Suite 1000, Nashville, TN 37205;

10. Stewart F. Stowers, M.D., Tennessee Orthopaedic Alliance, 4230 Harding Rd, Suite 1000, Nashville, TN 37205;
11. Christopher L. Woods, D.D.S., 1502 17th Ave South, Nashville, TN 37212;
12. Friends and family of the deceased.

(B) The following documents may be used to support the claims of the plaintiff herein:

1. Death certificate, annexed;
2. Frank M. Berklacich, M.D. - records annexed;
3. James R. Cato, M.D. - records, annexed;
4. Carl R. Hampf, M.D. - records, annexed;
5. Heritage Medical Associates, P.C. - records annexed;
6. Heritage Medical Associates, P.C. - bills annexed;
7. Loden Vision Centers - records annexed;
8. Edward S. Mackey, M.D. - records annexed;
9. Paul R. McCombs, III, M.D. - records annexed;
10. University Medical Center - records annexed;
11. Christopher L. Woods, D.D.S. - records annexed;
12. Eckerd Drugs- records annexed;
13. Records obtained from the Franklin vs. Parke-Davis litigation;
14. Records obtained from the United States of America vs. Warner-Lambert Company LLC litigation, including but not limited to, the global criminal and civil settlement agreement resolving Warner-Lambert's criminal and civil liability regarding the marketing of the drug Neurontin for uses not approved by the United States Food and Drug Administration;
15. Records obtained from the defendant in the course of discovery.

(C) Computation of Damages:


Plaintiff claims damages for wrongful death.

(D) Insurance Agreements:

Not applicable to the plaintiff.

Dated: July 24, 2006

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